

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
NASHEAN FOLDS, :
a/k/a "Snow," :
a/k/a "Nae Heffner," :
DAVID HIGHTOWER, :
a/k/a "Haze," :
GREGORY LUCK, :
a/k/a "Boogz," :
a/k/a "Boogley," :
TREMAIN MOORE, :
a/k/a "Trey Dub," :
a/k/a "Frass," :
COREY ROPER, :
a/k/a "Sneaks," and :
ANTWONE WASHINGTON, :
a/k/a "Bigbank Gotti," :
a/k/a "Adam Reyes," :
:
Defendants. :
:
- - - - - X

SEALED INDICTMENT

S1 16 Cr. 505

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 7-26-16

COUNT ONE

(Sex Trafficking Conspiracy)

The Grand Jury charges:

1. From at least in or about February 2015, up to and including in or about the present, in the Southern District of New York and elsewhere, NASHEAN FOLDS, a/k/a "Snow," a/k/a "Nae Heffner," DAVID HIGHTOWER, a/k/a "Haze," GREGORY LUCK, a/k/a "Boogz," a/k/a "Boogley," TREMAIN MOORE, a/k/a "Trey Dub," a/k/a "Frass," COREY ROPER, a/k/a "Sneaks," and ANTWONE WASHINGTON,

a/k/a "Bigbank Gotti," a/k/a "Adam Reyes," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a) and (b).

2. It was a part and object of the conspiracy that NASHEAN FOLDS, a/k/a "Snow," a/k/a "Nae Heffner," DAVID HIGHTOWER, a/k/a "Haze," GREGORY LUCK, a/k/a "Boogz," a/k/a "Boogley," TREMAIN MOORE, a/k/a "Trey Dub," a/k/a "Frass," COREY ROPER, a/k/a "Sneaks," and ANTWONE WASHINGTON, a/k/a "Bigbank Gotti," a/k/a "Adam Reyes," the defendants, and others known and unknown, would and did, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and to benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and (b)(1).

3. It was a further part and object of the conspiracy that NASHEAN FOLDS, a/k/a "Snow," a/k/a "Nae Heffner," DAVID HIGHTOWER, a/k/a "Haze," GREGORY LUCK, a/k/a "Boogz," a/k/a "Boogley," TREMAIN MOORE, a/k/a "Trey Dub," a/k/a "Frass," COREY ROPER, a/k/a "Sneaks," and ANTWONE WASHINGTON, a/k/a "Bigbank Gotti," a/k/a "Adam Reyes," the defendants, and others known and unknown, would and did, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and to benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and (b)(2).

(Title 18, United States Code, Section 1594(c).)

COUNT TWO

(Sex Trafficking of Minor Victim-1)

The Grand Jury further charges:

4. From at least in or about February 2015, up to and including in or about the present, in the Southern District of New York and elsewhere, NASHEAN FOLDS, a/k/a "Snow," a/k/a "Nae Heffner," and GREGORY LUCK, a/k/a "Boogz," a/k/a "Boogley," the

defendants, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years, and that means of force, threats of force, fraud, and coercion described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means would be used to cause the person to engage in a commercial sex act, and did aid and abet the same, to wit, FOLDS and LUCK recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited an individual who was less than 18 years old ("Minor Victim-1"), who was then caused to engage in at least one commercial sex act by means of force, threats of force, fraud, and coercion.

(Title 18, United States Code, Sections 1591(a), (b)(1), and (b)(2), and 2.)

COUNT THREE

(Sex Trafficking of Minor Victim-2 and Minor Victim-3)

The Grand Jury further charges:

5. In or about March 2016, in the Southern District of New York and elsewhere, DAVID HIGHTOWER, a/k/a "Haze," and TREMAIN MOORE, a/k/a "Trey Dub," a/k/a "Frass," the defendants, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years, and that means of force, threats of force, fraud, and coercion described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means would be used to cause the person to engage in a commercial sex act, and did aid and abet the same, to wit, HIGHTOWER and MOORE recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited two individuals who were less than 18 years old ("Minor Victim-2" and "Minor Victim-3"), who were then caused to engage in at

least one commercial sex act by means of force, threats of force, fraud, and coercion.

(Title 18, United States Code, Sections 1591(a), (b)(1), and (b)(2), and 2.)

COUNT FOUR

(Sex Trafficking of Minor Victim-4)

The Grand Jury further charges:

6. In or about December 2015, up to and including in or about the present, in the Southern District of New York and elsewhere, COREY ROPER, a/k/a "Sneaks," and ANTWONE WASHINGTON, a/k/a "Bigbank Gotti," a/k/a "Adam Reyes," the defendants, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years, and that means of force, threats of force, fraud, and coercion described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means would be used to cause the person to engage in a commercial sex act, and did aid and abet the same, to wit, ROPER and WASHINGTON recruited, enticed, harbored,

transported, provided, obtained, advertised, maintained, patronized, and solicited an individual who was less than 18 years old ("Minor Victim-4"), who was then caused to engage in at least one commercial sex act by means of force, threats of force, fraud, and coercion.

(Title 18, United States Code, Sections 1591(a), (b)(1), and (b)(2), and 2.)

COUNT FIVE

(Kidnapping)

The Grand Jury further charges:

7. In or about February 2016, in the Southern District of New York and elsewhere, COREY ROPER, a/k/a "Sneaks," the defendant, unlawfully, willfully, and knowingly seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away and held for ransom and reward and otherwise a person, and in so doing willfully transported said person in interstate commerce, to wit, ROPER forced a female individual ("Victim-1") into a car and drove Victim-1 against Victim-1's will from New Jersey to New York.

(Title 18, United States Code, Sections 1201(a)(1) and 2.)

COUNT SIX

**(Conspiracy to Travel in Interstate Commerce and Use Facilities
in Interstate Commerce to Promote Unlawful Activity)**

The Grand Jury further charges:

8. From at least in or about February 2015 up to and including at least in or about the present, in the Southern District of New York and elsewhere, NASHEAN FOLDS, a/k/a "Snow," a/k/a "Nae Heffner," DAVID HIGHTOWER, a/k/a "Haze," GREGORY LUCK, a/k/a "Boogz," a/k/a "Boogley," TREMAIN MOORE, a/k/a "Trey Dub," a/k/a "Frass," COREY ROPER, a/k/a "Sneaks," and ANTWONE WASHINGTON, a/k/a "Bigbank Gotti," a/k/a "Adam Reyes," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1952(a)(3).

9. It was a part and object of the conspiracy that NASHEAN FOLDS, a/k/a "Snow," a/k/a "Nae Heffner," DAVID HIGHTOWER, a/k/a "Haze," GREGORY LUCK, a/k/a "Boogz," a/k/a "Boogley," TREMAIN MOORE, a/k/a "Trey Dub," a/k/a "Frass," COREY ROPER, a/k/a "Sneaks," and ANTWONE WASHINGTON, a/k/a "Bigbank Gotti," a/k/a "Adam Reyes," the defendants, and others known and unknown, did travel in interstate and foreign commerce and use and cause to be used facilities in interstate and foreign commerce, with the intent to promote, manage, establish, carry

on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, a criminal business enterprise engaged in sex trafficking and promoting prostitution in violation of New York Penal Law §§ 230.20 and 230.34, and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

Overt Acts

10. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

- a. In or about December 2015, NASHEAN FOLDS, a/k/a "Snow," a/k/a "Nae Heffner," the defendant, rented a hotel room for the purposes of prostitution.
- b. In or about March 2016, DAVID HIGHTOWER, a/k/a "Haze," the defendant, traveled from New York to Georgia for the purposes of prostitution.
- c. In or about March 2015, GREGORY LUCK, a/k/a "Boogz," a/k/a "Boogley," the defendant, communicated with Minor Victim-1 via the Internet for the purposes of prostitution.
- d. In or about March 2016, TREMAIN MOORE, a/k/a

"Trey Dub," a/k/a "Frass," traveled from New York to Georgia for the purposes of prostitution.

e. In or about April 2016, COREY ROPER, a/k/a "Sneaks," the defendant, purchased a pre-paid debit card for the purposes of prostitution.

f. In or about April 2016, ANTWONE WASHINGTON, a/k/a "Bigbank Gotti," a/k/a "Adam Reyes," the defendant, rented a hotel room for the purposes of prostitution.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATIONS

11. As a result of committing one or more of the offenses as alleged in Counts One through Four of this Indictment, NASHEAN FOLDS, a/k/a "Snow," a/k/a "Nae Heffner," DAVID HIGHTOWER, a/k/a "Haze," GREGORY LUCK, a/k/a "Boogz," a/k/a "Boogley," TREMAIN MOORE, a/k/a "Trey Dub," a/k/a "Frass," COREY ROPER, a/k/a "Sneaks," and ANTWONE WASHINGTON, a/k/a "Bigbank Gotti," a/k/a "Adam Reyes," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real and personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of the offenses alleged in Counts One through Four, and any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result

of the offenses alleged in Counts One through Four, or any property traceable to such property.

12. As a result of committing the offense alleged in Count Six of this Indictment, NASHEAN FOLDS, a/k/a "Snow," a/k/a "Nae Heffner," DAVID HIGHTOWER, a/k/a "Haze," GREGORY LUCK, a/k/a "Boogz," a/k/a "Boogley," COREY ROPER, a/k/a "Sneaks," and ANTWONE WASHINGTON, a/k/a "Bigbank Gotti," a/k/a "Adam Reyes," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense charged in Count Six.

Substitute Asset Provision

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;


(d) has been substantially diminished in value;
or

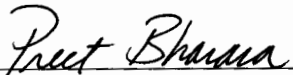
(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C.

§ 2253(b), 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 1594 and 2253; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)


FOREPERSON


PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

NASHEAN FOLDS, et al.,

Defendants.

INDICTMENT

16 Cr.

(18 U.S.C. §§ 1594(c), 1591(a),
(b)(1), and (b)(2), 1201, 371, and 2.)

PREET BHARARA

United States Attorney


Foreperson


Deputy

TRUE BILL & SEALED INDICTMENT
- MAG. JUDGE RONALD L. ELLIS
- wheeled out to J. BREHWALD
7-26-16 